

Hon. Brian A Tsuchida

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

)	
OSCAR LEE OLIVE, IV., an individual)	Docket No. 2:18-cv-00862-BAT
)	DECLARATION
Plaintiff,)	
vs.)	
)	
HAYLEY MARIE ROBINSON, an individual,)	
)	
and)	
JUSTUS KEPEL, an individual, and Does 1-20 inclusive)	
)	
)	
Defendants.)	
)	
)	
)	

DEFENDANT

I, OSCAR LEE OLIVE IV, under penalty of perjury pursuant to the laws of the State of Washington, declare and states as follows:

1. I am over the age of eighteen (18) and competent to testify therein. I make this declaration based on my personal knowledge.
2. I am representing myself Pro Se, in the above-entitled action.
3. The information sought in the discovery is essential to provide factual support for claims of Defamation against Plaintiff.
4. On Jan 29, 2019, I sent Plaintiff's First Set of Interrogatories, Admissions and Requests for Production via process server to Defendant Robinson at her home address.
5. Attached hereto as Exhibit "A" is a true and correct copy of Interrogatories, Admissions and Requests for Production, incorporated herein by this reference.
6. On February 26, 2019, I sent an email that asked if Defendant Robinson would have the First Set of Interrogatories, Admissions and Requests for Production completed by the March 1, 2019 due date. On February 27, 2019, Defendant Robinson replied by saying "she would have them completed by the following week."
7. Attached hereto as Exhibit "B" is a true and correct copy of the email sent to Defendant Robinson on February 26, 2019. It is also the response from Defendant Robinson February 27, 2019.
8. On March 3, 2019 at 11:25am I sent an additional email asking when the Defendant Robinson would have the First Set of Interrogatories, Admissions and Requests for Production completed as told by her in the Exhibit "B" email.
9. Attached hereto as Exhibit "C" is a true and correct copy of the email sent to Defendant Robinson on March 3, 2019 asking which date the requested First Set of Interrogatories, Admissions and Requests for Production will be completed by and if no reply that a CR26i

1 call would be made the following day March 5, 2019 at 12:00pm (Pacific standard time).

2 10. On March 3, 2019 at 5:27pm the Defendant Robinson replied three hours and 27 minute
3 late stating the First Set of Interrogatories, Admissions and Requests for Production would be
4 completed by Friday, March 8, 2019.

5 11. As instructed on the email Exhibit "C" I stated I would setup a CR26i phone call the next
6 day (March 5, 2019) at 12:00pm (Pacific standard time) if I did not receive a email by
7 12:00pm March 4, 2019.

8 12. At 12:04pm (Pacific standard time) March 5, 2019 I called Defendant Robinson and
9 received no answer.
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11 13. As of March 11, 2019 I have received no reply from Defendant Robinson regarding the
12 First Set of Interrogatories, Admissions and Requests for Production that were due on
13 March 1, 2019.
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17 Dated: March 11, 2019

Respectfully submitted,

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22 By:



Oscar Lee Olive, IV

Plaintiff, In Pro Per

Oscar.L.Olive@gmail.com

(850) 319-9023

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28 Plaintiff's DECLARATION

- 3 -

Oscar Olive (Plaintiff) Parties
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